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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20555

OCT 29 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Information Sought on Methods for)
Verifying Compliance With E911) ET Docket No. 99-300
Accuracy Standards)

To: Chief, Wireless Telecommunications Bureau
Chief, Office of Engineering and Technology

COMMENTS OF NEXTEL COMMUNICATIONS, INC.

I. INTRODUCTION

Pursuant to the October 8, 1999 Public Notice of the Federal Communications Commission ("Commission"), Nextel Communications, Inc. ("Nextel") respectfully submits these Comments on establishing methods to measure compliance with the Phase II Enhanced 911 ("E911") accuracy requirements.

Given the strict accuracy standards imposed by the Commission in its Third Report and Order in CC Docket No. 94-102,1/ the methodologies used for measuring carriers' location accuracy are critical to effective and efficient implementation of Phase II E911. Therefore, Nextel supports the Commission's decision to address these important and complex issues. However, the Commission should not attempt to resolve these highly technical issues through a Public Notice and comment process; rather, the Commission should leave their resolution to a technical working group of industry, Commission and public safety participants. This

1/ Third Report and Order, FCC 99-245, released October 6, 1999.

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group should be charged with developing formal industry standards for Phase II accuracy assessment and compliance evaluation.

II. DISCUSSION

Establishing appropriate parameters for measuring carriers' Phase II location accuracy is critical to the implementation of Phase II E911. Without specific guidelines and methodologies for measuring call location, carriers will be unable to determine whether they have properly tested their systems for compliance with the Commission's rules.^{2/} For example, given the "real-world" variations in topology, geography, foliage and other factors that can impact the making and location of a wireless call, carriers must have some guidance on what types of calls to measure for location accuracy and how many of those calls should be, for example, in-building as opposed to on a rural highway. As the Commission demonstrated in the Public Notice, this is only one of many such issues that must be resolved prior to implementing Phase II location technologies.

Nextel supports the Commission's efforts to raise the awareness of the complexities involved in measuring compliance with the accuracy standards. However, many of the issues raised in the Public Notice result in even more questions that are highly technical and equally complex. Given the technical nature of these issues, the public interest would be best served by permitting

^{2/} Additionally, without specific parameters for measuring compliance, equipment manufacturers would not have sufficient information to integrate the equipment upgrades necessary for Phase II location capabilities.

technical experts from the industry, industry trade organizations, the public safety community and the Commission to discuss and debate them, and arrive at industry standards for all carriers to follow in implementing their Phase II location technologies.

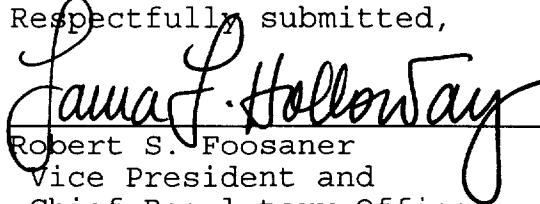
With the Commission's supervision, through the Wireless Telecommunications Bureau ("WTB") and the Office of Engineering and Technology ("OET"), an industry working group could thoroughly investigate, debate and arrive at the most effective measurement parameters for Phase II E911 testing. The Commission, moreover, could ensure expeditious resolution of these issues by actively participating in the working group and establishing reasonable deadlines for resolving the issues and developing standards.

III. CONCLUSION

Given the complex and technical nature of the issues involved, Nextel is not responding to any of the specific questions raised in the Public Notice. Rather, Nextel respectfully submits that the Commission should convene a working group or task force to address the myriad issues raised by the accuracy standards and establish an

industry-wide methodology for measuring Phase II location requirements.

Respectfully submitted,


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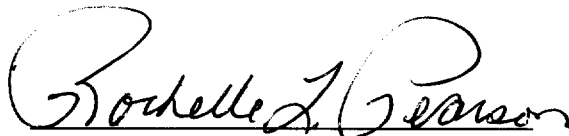
Date: October 29, 1999

CERTIFICATE OF SERVICE

I, Rochelle L. Pearson, hereby certify that on this 29th day of October 1999,
caused a copy of the attached Comments of Nextel Communications, Inc.
to be served by hand delivery to the following:

Robert Eckert, Engineer
Office of Engineer & Technology
Federal Communications Commission
445 12th Street, SW
Room 7-A364
Washington, DC 20554

Marty Liebman, Senior Engineer
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Federal Communications Commission
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A handwritten signature in cursive script that reads "Rochelle L. Pearson". The signature is written in black ink and is positioned above the printed name.

Rochelle L. Pearson